




Council District Six
City of San Diego
MEMORANDUM

DATE: January 8, 2008

TO: Bill Anderson, Executive Director
City Planning & Development

FROM: Councilmember Donna Frye 

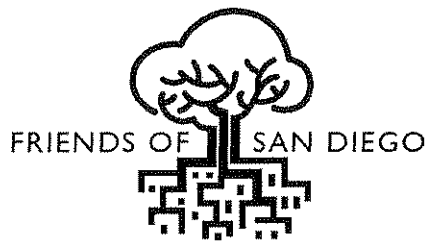
SUBJECT: Draft General Plan Concerns, Part 2

Please review and provide a written response to the attached letter regarding the most recent draft of the General Plan and the Theoretical Buildout chapter of the General Plan EIR. The issues raised in the attachment are in addition to the concerns raised in my previous memo to you, dated December 14, 2007.

I would appreciate your prompt response to both memos, including a breakdown of the Theoretical Buildout chapter in the General Plan EIR, to allow for an adequate review period by Council and the public prior to the full City Council hearing in February.

Attachment

DF/ps



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12/27/07

To: Donna Frye, Chair, NR&C

**Re: General Plan EIR, Theoretical Buildout.
Breakdown Needed**

I'm sure that you have reviewed the Theoretical Buildout chapter in the EIR for the draft General Plan. The footnotes show that this chapter is required as the result of a lawsuit in El Dorado County.

The leaders of my group find it disturbing that there is enough residential development allowed under existing community plans for a 54% increase in housing units. This is double the increase which is forecast to be required by 2030. The capacity for non-residential, per existing zoning, is even more disturbing-- a 439% increase. An increase of even one-quarter this magnitude would double the City's non-residential space, and bring huge increases in workers, vehicles, and added demands for housing, water and energy.

These figures are relevant to all elements of the General Plan, including Conservation, Recreation and Historic Preservation.

The planning staff has sought to provide assurances that a substantial portion of the Theoretical Buildout is not likely to be built. Yet we feel that residents and the City Council should form their own opinions after reviewing a breakdown of the data.

I will provide two examples why this is necessary.

1. ESL. The staff has stated that many parcels are unlikely to be built upon because of environmentally sensitive land. Yet the experience of coastal California cities is that rising land values eventually make it cost-effective to build on slopes and floodplain fringes. It could be argued that in time, nearly every parcel which is zoned for development will tend to get development. We need to know which communities contain the ESL sites which are designated for higher density, and for which the staff has calculated the Theoretical Buildout.

2. Apartments.

a. The staff has provided an example of an apartment complex that has 28 units and is designated for 30 units, and stated that this complex is unlikely to be rebuilt at full capacity. First of all, this hypothetical example is something of a straw man designed to be blown down, because 28 units represents 93% of the zoned potential of 30 units, a fairly high percentage.

b. Many real-world residential parcels are more likely to experience demolition and rebuilding. For example, University Heights has many parcels with one existing house, but are designated in the community plan for densities of two to four units. Rather than viewing demolitions as merely "theoretical", one might conclude that these older houses are actually quite likely to be torn down and replaced with more units, since they are developed at only 25-50% of their community plan capacity. It's not too far-fetched to believe that University Heights could see development at close to the maximum allowable density within 20-40 years, with most of the charming old homes demolished.

What's needed:

The EIR chapter on Theoretical Buildout does not include supporting data which would allow the public and the City Council to understand the meaning of the totals. In contrast, the Housing Element came with a table of the housing sites, identified by community, and also available on the City website at the parcel level.

The City has the Buildout data at the community and parcel level, because they have it in GIS format.

Several communities have requested more information about how much could be built under existing community plans and zoning. Pacific Beach and Ocean Beach come to mind.

We request that as a councilmember and as chair of NRC, you request that planning staff provide a breakdown of the Theoretical Buildout. This breakdown is needed by community, for residential and non-residential.

A downloadable list by parcel, similar to the list for the Housing Element, would also be important for seeing where this theoretical development could occur.

Conclusion:

Before being asked to adopt a new General Plan which encourages higher densities, it is essential that the public and City Council be able to understand the existing capacity-- for residential and non-residential development.

It is also essential that we be able to analyze the difference between the Housing Element's stated capacity of 122,000 housing units, a 28 year supply, and the Theoretical Buildout's capacity of 264,000 units, a 60 year supply. Both numbers are large! The large number of housing sites already designated in community plans may be an "inconvenient truth", but it's a situation that we need to examine.

Thank you for your consideration.

Tom Mullaney, president